

**Portsmouth City Council's Response to the
Inspectors' questions for
Matter 9
Thriving Economy policies**



Matter 9: Thriving Economy policies

Issue: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the employment, retail, culture and tourism policies in Chapter 7 of the Plan.

This issue includes detailed consideration of policies PLP26 to PLP30.

PLP26: Safeguarding Employment Land

- 1) **Is it sufficiently clear how the policy should be applied in decision-making? In particular, is it clear when land or premises will be considered ‘not fit for purpose’, when a pragmatic approach may be taken to marking requirements, and how the quality of jobs and employment opportunities may be assessed?**
 - 9.1.1 Yes, it is clear how this policy will be applied in decision-making. Appendix 4 sets out the marketing requirements for this and three other policies in the Plan and explains the requirements of a marketing report to support change of use applications relating to these four policies.
 - 9.1.2 The following sentence in paragraph 7.33 allows for some flexibility between employment uses as defined in the GDPO and other commercial uses that would provide a similar number of jobs: 'the marketing requirements may be reduced on a pragmatic basis for change of use applications to other commercial uses that generate similar numbers of jobs and do not conflict with other Local Plan policies particularly town centre policies.' This will be a matter for negotiation at the pre-application stage. It will be a matter of judgement for the local planning authority whether a potential commercial use would be a suitable use for a particular site and thus the marketing requirements could be reduced. An example of such a decision is a recent change of use application at Lakeside that was granted permission for a change from class E(g)(i) offices to a flexible use as either Class E(g)(i) offices or Class F1(a) Provision of education (24/00551/FUL). The permission was in line with the emerging Local Plan policy following the logic that the provision of small scale educational facilities on the business park would enhance its business offer.
- 2) **Is part 4 of the policy justified and effective in not allowing the loss of marine business premises on waterfront sites in any circumstances?**
 - 9.2.1 Yes, as a coastal city and being home to the Royal Navy the marine sector is a key part of the local and regional economy. This is fully justified in the Housing and Economic Development Needs Assessment (HEDNA)[HO01] and section 5.3 of the Thriving Economy Topic Paper [TP14]. It is true that marine businesses are not a separate use class in the GDPO, but criterion 4 of the Policy would still need to be taken into account in any change of use application that involved a loss of a marine use to another commercial use or housing.
- 3) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**
 - 9.3.1 Yes, the policy is positively prepared, justified, effective and consistent with national policy. It is supported by evidence provided in the HEDNA [HO01], the Thriving Economy Topic Paper [TP14] and other documents in the Thriving Economy part of the Examination Library.

PLP27: Employability and Skills

4) **Does the policy clearly set out how applicants may demonstrate that each of its criteria are satisfied, and will all the criteria apply in all circumstances for the types of development specified in paragraph 7.39 of the Plan?**

9.4.1 The policy will be implemented in tandem with the Achieving Employment and Skills Plans Supplementary Planning Document (SPD) [SPD05] and together they provide sufficient clarity to applicants. Yes, all the criteria will apply to all the types of development specified in paragraph 7.39 of the Plan.

5) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**

9.5.1 This is an important policy for the Council, because it seeks to raise skill levels and reduce barriers to employment in a City with some of the highest levels of deprivation in the country. It is evidenced by the HEDNA [HO01] and the Thriving Economy Topic Paper [TP14] it is effective when considered alongside the Achieving Employment and Skills Plans SPD [SPD05] and is line with national policy.

PLP28 Town Centres

6) **Does the Plan provide a clear and effective strategy for meeting the identified need for retail floorspace over the plan period, having regard to the findings of the Retail and Leisure Study Update 2024 [TE14]?**

9.6.1 Yes, the Plan provides a clear and effective strategy for meeting the identified need for retail floorspace over the plan period. Paragraph 7.48 of the Plan references the Retail and Leisure Study Update 2024 [TE14], which shows a projected increase in the need to plan for an additional retail floorspace of between 6,300m² and 6,700m². The majority of this (4,200m² - 4,600m²) is comparison goods floorspace, which will be accommodated within the Commercial Road area and Gunwharf Quays, both of which are identified centres that sit at the top of the Town Centre Hierarchy (figure 7.2) under Policy PLP28. The Study [TE14] also identifies a need for additional floorspace regarding convenience goods (300m² - 350m²), however this is limited. It is anticipated that the identified need for retail floorspace overall will be accommodated in the centres identified under Policy PLP28 over the plan period.

9.6.2 Despite a significant change to the retail market in recent years due to the online retail shift accelerating, retail uses still play an important role in contributing to the vitality and viability of centres within the City. This is why retail uses are referenced throughout policy criteria under Policy PLP28. The importance of retail uses is also highlighted in Policy PLP6: Portsmouth City Centre; criterion 4 states that "proposals falling within the Commercial Road Area...should include town centre uses at ground level..." and paragraph A70 states that "proposals should protect and enhance the retail offer of the City Centre..." In doing so, this further demonstrates how the Plan is seeking to meet the identified need for retail floorspace.

7) **Is it sufficiently clear how the policy would operate for Core Commercial Areas in centres that differ in their position in the hierarchy in Table 7.2 of the Plan?**

9.7.1 The policy requirements for Core Commercial Areas are the same for all centres, regardless of their position in the hierarchy in table 7.2 of the Plan. The Council proposes adding the following modification to paragraph 7.53 of the Plan to provide greater clarification:

The purpose of this policy is to set a positive approach to development of main town centre uses in accordance with the town centre hierarchy and ensure vibrant and viable town centres. The policy directs proposals for new town centre uses to the town centres and identifies the Core Commercial Area as the place where retail, commercial, leisure, cultural and service uses should be focused and retained. Policy requirements relating to the Core Commercial Areas are applied consistently

for all centres, regardless of their position in the hierarchy in table 7.2 of the Plan. The policy provides criteria to enable consideration of development of other uses where they make a positive contribution to the vitality and viability of a designated centre.

8) Is it sufficiently clear what is a 'core frontage' and where these are located?

9.8.1 Core frontages are located within the Core Commercial Areas. The Council does not consider it necessary to make explicit reference to them under the policy and proposes the following amendments to criterion 5.e) of Policy PLP28: Town Centres and paragraph 7.60 to remove references to core frontages:

5. e) There are no significant harmful impacts on the function, either individually or cumulatively, on the vitality or viability of the ~~core frontage~~ or Core Commercial Area; and

7.60 "The policy seeks to ensure that there are no significant harmful impacts, either individually or cumulatively, on the function or the vitality or viability of the ~~core frontage~~ or wider Core Commercial Area. This should ensure that the quantum of floorspace and shop front for town centre uses is retained at ground floor level, and that the prevalence and concentration of other uses do not undermine the role and function of the ~~core frontages~~ or the Core Commercial Area as a whole..."

9) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

9.9.1 Yes, as supported by the evidence in the Retail and Leisure Study Update 2024 [TE14] and the Town Centre Assessment [TE13]. The policy also defines a network and hierarchy of town centres (Figure 7.2 of the Plan), including the extent of such centres as shown on the Policies Map [KD04a-KD04c). This is consistent with paragraph 90 a) and b) of the NPPF.

PLP29: Small Local Shops

10) Is the policy positively prepared, justified, effective and consistent with national policy?

9.10.1 Yes, the policy is positively prepared, justified, effective and consistent with national policy. This is explained in section 8 of the Thriving Economy Topic Paper [TP14].

PLP30: Cultural and Visitor Economy

11) Is the policy positively prepared, justified, effective and consistent with national policy?

9.11.1 Yes, the policy is positively prepared, justified, effective and consistent with national policy. The cultural and visitor economy is a new and fast emerging part of the City's economy. This is evidenced by the longlisting of Portsmouth for the title of UK City of Culture 2029 with news currently awaited on whether it has made the shortlist. Details of the bid are set out in this BBC news item [PCC30]. The Cultural, Creative and Visitor Economy Background Paper [TP05] examines the growth of the cultural, creative and visitor economy in Portsmouth and provide an overview of the national and local policy context relating to tourism, culture and the arts.